

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO.**

JOYCELYN PEREZ,

Plaintiff,

v.

OVERSEAS TRAVEL OF FLORIDA, LLC  
D/B/A OVERSEAS LEISURE GROUP,  
FELIX BRAMBILLA, and  
TRICIA C. MENENDEZ,

Defendants.

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**COMPLAINT**

*{Jury Trial Demanded}*

Plaintiff JOYCELYN PEREZ (“Perez”) brings this action against Defendants OVERSEAS TRAVEL OF FLORIDA, LLC D/B/A OVERSEAS LEISURE GROUP (“OLG”), FELIX BRAMBILLA (“Brambilla”), and TRICIA C. MENENDEZ (“Menendez”) and alleges as follows:

1. This is an action arising under the Fair Labor Standards Act 29 U.S.C. §§ 201-219 (“FLSA”). Jurisdiction is conferred on this Court by 28 U.S.C. § 1331 and 29 U.S.C. § 216(b).
2. At all times material hereto, Plaintiff was a resident of Florida and an “employee” of Defendants as defined by the FLSA.
3. At all times material hereto, OLG was a Florida corporation that regularly transacted business in Broward County, Florida.
4. Upon information and belief, OLG’s gross sales or business generated was over \$500,000 per year at all times material hereto.

5. OLG was an enterprise engaged in commerce or the production of goods for commerce and is covered by the FLSA at all times material hereto.

6. At all times material hereto, Perez engaged in interstate communication on a regular and recurring basis, including but not limited to communication via telephone with vendors located in Qatar, an average of five times per week.

7. Perez engaged in interstate commerce on a regular and recurring basis and is individually covered by the FLSA.

8. At all times material hereto, Perez engaged in interstate commerce on a regular and recurring basis, including but not limited to interstate travel to Qatar.

9. Brambilla is an FLSA employer as defined in 29 U.S.C. § 203(d), is an owner and/or manager of OLG, ran the day-to-day operations, and had operational control over OLG, and was directly involved in decisions affecting duties, employee compensation, and hours worked by employees, such as Plaintiff.

10. Menendez is an FLSA employer as defined in 29 U.S.C. § 203(d), is an owner and/or manager of OLG, ran the day-to-day operations, and had operational control over OLG, and was directly involved in decisions affecting duties, employee compensation, and hours worked by employees, such as Plaintiff.

11. OLG operates a business involved in travel arrangements and event management.

12. Defendants have employees handling, selling, or otherwise working on goods or materials that have been moved in or produced for commerce, including but not limited to computers, phones, pens, and paper.

13. Perez worked for Defendants as an executive assistant.

14. Defendants failed to pay Perez's full and proper overtime wages.

15. Defendants knowingly and willfully refused to pay Plaintiff's legally-entitled wages.

16. Attached as **Exhibit A** is a preliminary calculation of Perez's claims, including date ranges, hours worked, rates of pay, and unpaid wages; these amounts may change as Plaintiff engages in the discovery process.

17. Plaintiff retained the services of the undersigned and is obligated to pay for the legal services provided.

**COUNT I**  
**VIOLATION OF THE FAIR LABOR STANDARDS ACT**  
**AGAINST ALL DEFENDANTS**

18. Plaintiff realleges and incorporates the allegations set forth in paragraphs 1-17 above as if set forth herein in full.

19. Pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b), Plaintiff is entitled to (i) time-and-a-half overtime pay and (ii) liquidated damages.

20. Plaintiff seeks recovery of damages as referenced above and further seeks interest, costs, and attorneys' fees pursuant to 29 U.S.C. § 216(b).

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, plus costs, reasonable attorneys' fees, and such other remedy as the court deems just and appropriate.

Respectfully submitted,

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